

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA
v.
JOHN NASRAT

No. 3:13-CR-00093
CHIEF JUDGE HAYNES

*Open
Thursday
no GRANTED
Jill J*

MOTION TO ENLARGE PLEA DEADLINE

Comes now the Defendant, John Nasrat, by and through undersigned counsel, and hereby moves this Honorable Court to enlarge the March 3, 2014 plea deadline (Docket No. 29) by two weeks so that the parties can iron out the details of the plea agreement.

In support of this motion, Mr. Nasrat submits the following:

Mr. Nasrat is charged in the above referenced indictment with conspiracy to possess and distribute a controlled substance analogue in violation of Title 21 U.S.C. section 846, delivery of misbranded drugs into interstate commerce with the intent to commit fraud in violation of Title 21 U.S.C. sections 331 (a), 333(a)(2) and 352(a)(b) and (f), and possession with intent to distribute a Schedule I controlled substance in violation of Title 21 U.S. C. section 841(a)(1) (Docket No. 1). On June 3, 2013, Mr. Nasrat was arraigned on the above referenced indictment and entered pleas of not guilty (Docket No. 12).

Mr. Nasrat's plea deadline is March 3, 2014 and his jury trial is scheduled for March 18, 2014 (Docket No. 29). Both the defense and the government have conferred on multiple occasions about the potential sentencing guidelines range and have had extensive plea discussions. Over the past week, the parties have made significant progress and have reached a tentative plea agreement. Several aspects of the plea agreement need to be finalized and confirmed. As such the parties request a two week extension of the plea deadline and represent